

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NATIONAL STEEL CAR LIMITED,)	
)	
Plaintiff/Counterclaim-)	
Defendant,)	
)	
v.)	C.A. No. 24-594-JLH-CJB
)	
FREIGHTCAR AMERICA, INC.,)	
FREIGHTCAR NORTH AMERICA, LLC,)	
JAC OPERATIONS, INC., AND)	
FCA-FASEMEX, LLC,)	
)	
Defendant/Counterclaim-)	
Plaintiffs.)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiff National Steel Care Limited respectfully moves this Court to schedule a teleconference to address an outstanding dispute regarding discovery matters as set forth in its August 13, 2025 letter (D.I. 97).

OF COUNSEL:
Safet Metjahic
Robert D. Keeler
ICE MILLER LLP
1500 Broadway, Suite 2900
New York, NY 10036
(212) 824-4940

Kenneth Sheehan
Kevin Adams
ICE MILLER LLP
200 Massachusetts Ave NW, Suite 400
Washington, DC 20001
(202) 824-8666

/s/ Andrew E. Russell
John W. Shaw (No. 3362)
Andrew E. Russell (No. 5382)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
arussell@shawkeller.com
Attorneys for National Steel Car Limited

Dated: August 13, 2025